

ISSUANCE DATE: August 26, 2019



GEORGIA

DEPARTMENT OF NATURAL RESOURCES

ENVIRONMENTAL PROTECTION DIVISION

Air Quality - Part 70 Operating Permit Amendment

Facility Name: West Fraser – Dudley Lumber Mill
Facility Address: 3770 US Highway 80 West
Dudley, Georgia 31022 Laurens County
Mailing Address: P.O. Box 127
Dudley, Georgia 31022
Parent/Holding Company: West Fraser, Inc.
Facility AIRS Number: 04-13- 175-00035

In accordance with the provisions of the Georgia Air Quality Act, O.C.G.A. Section 12-9-1, et seq and the Georgia Rules for Air Quality Control, Chapter 391-3-1, adopted pursuant to and in effect under the Act, the Permittee described above is issued an amendment to the Part 70 Operating Permit for:

The construction and operation of a new lumber mill that includes two continuous kilns, one wood-fired thermal oil heater system, one sawmill, one planer mill, and log yard.

This Permit Amendment is conditioned upon compliance with all provisions of The Georgia Air Quality Act, O.C.G.A. Section 12-9-1, et seq, the Rules, Chapter 391-3-1, adopted and in effect under that Act, or any other condition of this Amendment and Permit No. 2421-175-0035-V-05-0. Unless modified or revoked, this Amendment expires upon issuance of the next Part 70 Permit for this source. This Amendment may be subject to revocation, suspension, modification or amendment by the Director for cause including evidence of noncompliance with any of the above; or for any misrepresentation made in App No. TV-343417 dated **March 11, 2019**; any other applications upon which this Amendment or Permit No. 2421-175-0035-V-05-0 are based; supporting data entered therein or attached thereto; or any subsequent submittal or supporting data; or for any alterations affecting the emissions from this source.

This Amendment is further subject to and conditioned upon the terms, conditions, limitations, standards, or schedules contained in or specified on the attached **38** pages.



[Signed]

Richard E. Dunn, Director
Environmental Protection Division

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PART 1.0 FACILITY DESCRIPTION**1.3 Process Description of Modification**

West Fraser – Dudley Lumber Mill (hereinafter “facility”) submitted a Title V permit amendment application dated March 11, 2019, which was logged in as Application No. TV-343417, for the authorization to construct and operate a new lumber mill to replace the existing lumber mill. The new lumber mill includes one sawmill process group (ID No. FUG-SM), one planer mill (ID No. PM), two indirectly fired continuous drying kilns (ID Nos. CDK-1 and CDK-2), one thermal oil heater system (ID No. TOHS), and one fire pump engine (ID No. FE).

The two new continuous kilns (ID Nos. CDK-1 and CDK-2) will be heated with hot thermal oil that is supplied by the wood-fired thermal oil heater system (ID No. TOHS). Each of the new kiln will have a rated capacity of 25 thousand board feet per hour (25 Mbf/hr), which is equivalent to 219 million board feet per year (MMbf/yr). The facility proposed a 300 MMbf/yr combined throughput cap for the two new kilns.

The wood-fired TOHS has a rated capacity of 137.8 million Btu per hour (MMBtu/hr). It will fire bark, sawdust, or dry planer shavings. TOHS will be equipped with multiclone separator followed by a 2-field electrostatic precipitator (ESP) for PM control and a continuous opacity monitoring system (COMS). TOHS will also be equipped with a selective non-catalytic reduction (SNCR) system for voluntary NOx emission control.

The fire pump engine (ID No. FE) will be used in case of a fire. It is a diesel fired engine and will have a rated capacity of 1.67 MMBtu/hr (input) and 238 break horsepower (bhp, output).

PART 2.0 REQUIREMENTS PERTAINING TO THE ENTIRE FACILITY

2.1 Facility Wide Emission Caps and Operating Limits

None applicable.

2.2 Facility Wide Federal Rule Standards

None applicable.

2.3 Facility Wide SIP Rule Standards

None applicable.

2.4 Facility Wide Standards Not Covered by a Federal or SIP Rule and Not Instituted as an Emission Cap or Operating Limit

None applicable.

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West Fraser – Dudley Lumber Mill

Permit No.: 2421-175-0035-V-05-1

PART 3.0 REQUIREMENTS FOR EMISSION UNITS

Note: Except where an applicable requirement specifically states otherwise, the averaging times of any of the Emissions Limitations or Standards included in this permit are tied to or based on the run time(s) specified for the applicable reference test method(s) or procedures required for demonstrating compliance.

3.1.1 Additional Emission Units

Emission Units		Specific Limitations/Requirements		Air Pollution Control Devices	
ID No.	Description	Applicable Requirements/Standards	Corresponding Permit Conditions	ID No.	Description
FUG-SM	Sawmill and Green End Operations Includes: Log bucking, debarker, chippers, bark hog, sawmill, and chip/bark/sawdust/shavings conveyance	391-3-1-.02(2)(b)1. 391-3-1-.02(2)(e)1.	3.2.1, 3.2.2, 3.4.4, 3.4.6, 6.2.7	N/A	N/A
TOHS	Thermal Oil Heater System Fuel: Wood Capacity: 137.8 MMbtu/hr	40 CFR 52.21 40 CFR 60 Subpart A 40 CFR 60 Subpart Db 40 CFR 63 Subpart A 40 CFR 63 Subpart DDDDD 391-3-1-.02(2)(d) 391-3-1-.02(2)(g)2.	3.2.1, 3.2.2, 3.2.3, 3.2.6, 3.2.7, 3.2.9, 3.3.1, 3.3.2, 3.3.4, 3.3.5, 3.3.6, 3.3.7, 3.3.8, 3.3.9, 3.3.10, 3.4.5, 4.2.1, 4.2.2, 4.2.3, 4.2.4, 4.2.5, 4.2.6, 4.2.7, 4.2.8, 4.2.9, 4.2.10, 4.2.11, 5.2.2, 5.2.3, 5.2.4, 5.2.5, 5.2.6, 5.2.7, 5.2.8, 5.2.9, 5.2.10, 6.1.8, 6.2.1, 6.2.2, 6.2.3, 6.2.7, 6.2.8, 6.2.9, 6.2.10, 6.2.11, 6.2.12, 6.2.13, 6.2.14, 6.2.15, 6.2.16, 6.2.17, 6.2.18, 6.2.19, 6.2.20, 6.2.21	SNCR MC ESP	Selective Non-catalytic Reduction Multiple Cyclone Collector Electrostatic Precipitator
CDK-1	Continuous Drying Kiln 1 Indirect Heated Capacity = 25 Mbf/hr	40 CFR 52.21 40 CFR 63 Subpart A 40 CFR 63 Subpart DDDD 391-3-1-.02(2)(b)1. 391-3-1-.02(2)(e)1.	3.2.1, 3.2.2, 3.2.4, 3.2.5, 3.2.10, 3.2.11, 3.3.3, 3.4.4, 3.4.6, 6.1.8, 6.2.4, 6.2.5, 6.2.6, 6.2.7	N/A	N/A
CDK-2	Continuous Drying Kiln 2 Indirect Heated Capacity = 25 Mbf/hr	40 CFR 52.21 40 CFR 63 Subpart A 40 CFR 63 Subpart DDDD 391-3-1-.02(2)(b)1. 391-3-1-.02(2)(e)1.	3.2.1, 3.2.2, 3.2.4, 3.2.5, 3.2.10, 3.2.11, 3.3.3, 3.4.4, 3.4.6, 6.1.8, 6.2.4, 6.2.5, 6.2.6, 6.2.7	N/A	N/A
PM	Planer Mill	391-3-1-.02(2)(b)1. 391-3-1-.02(2)(e)1.	3.2.1, 3.2.2, 3.2.8, 3.4.4, 3.4.6, 5.2.3, 5.2.5, 6.1.8, 6.2.7	PM	Cyclofilter

* Generally applicable requirements contained in this permit may also apply to emission units listed above. The lists of applicable requirements/standards and corresponding permit conditions are intended as a compliance tool and may not be definitive.

3.2 Equipment Emission Caps and Operating Limits

New Conditions

- 3.2.1 The Permittee shall construct and operate the emission units listed in Table 3.1.1 in accordance with the application submitted. If the Permittee constructs or operates a source or modification not in accordance with the application submitted pursuant to that rule or with the terms of any approval to construct, the Permittee shall be subject to appropriate enforcement action.
[391-3-1-.02(7)(b)15. and 40 CFR 52.21(r)(1)]
- 3.2.2 Approval to construct the emission units listed in Table 3.1.1 shall become invalid if construction is not commenced within 18 months after receipt of such approval, if construction is discontinued for a period of 18 months or more, or if construction is not completed within a reasonable time. The Director may extend the 18-month period upon a satisfactory showing that an extension is justified. This provision does not apply to the time period between construction of the approved phases of a phased construction project; each phase must commence construction within 18 months of the projected and approved commencement date. For purposes of this Permit, the definition of “commence” is given in 40 CFR 52.21(b)(9).
[391-3-1-.02(7)(b)15. and 40 CFR 52.21(r)(2)]
- 3.2.3 The Permittee shall not cause, let, suffer, permit, or allow any gases from the thermal oil heater system (ID No. TOHS) which:
- Contain volatile organic compounds (VOC) emissions in excess of 0.028 lb/MMBtu, on a 1-hour average, except during periods of startup and shutdown.
[391-3-1-.02(7)(b)7. and 40 CFR 52.21(j)(3)]
 - Contain carbon monoxide (CO) emissions in excess of 910 ppm by volume on a dry basis corrected to 3 percent oxygen, which is equivalent to 0.741 pound per million Btu (lb/MMBtu), on a 1-hour average, except during periods of startup and shutdown.
[391-3-1-.02(7)(b)7.; 40 CFR 52.21(j)(3); 40 CFR 63.7500(a)(1); 40 CFR 63.7500(a)(2); 40 CFR 63.7500(f); 40 CFR 63.7505(a); Item 12. of Table 1 to 40 CFR 63 Subpart DDDDD]
 - Contain total greenhouse gases (Total GHG) in excess of 126,500 tons of CO_{2(e)} per any 12 consecutive month period.
[391-3-1-.02(7)(b)7. and 40 CFR 52.21(j)(3)]
 - In addition to the emission limit specified in Paragraph c., the facility shall comply with the following Total GHG BACT Energy Efficiency Options.
[391-3-1-.02(7)(b)7. and 40 CFR 52.21(j)(3)]

Table 1. TOHS BACT Energy Efficiency Options

Energy Efficiency Option	Proposed Design / Requirement
Heating system maintenance	The heater and auxiliary thermal oil equipment will be maintained per the manufacturer's recommendations.
Heater process control	The heater will have an induced draft fan with a variable frequency drive (VFD) and instrumentation/controls for measuring fuel firing rate, induced draft, thermal oil flow and temperature, and excess O ₂ in the flue gas.
Reduction of flue gas quantities	The furnace will consist of two fuel cells which can fire independently or in unison. Each consists of a heavy rolled steel outside casing with high temperature insulation and an air space between the steel shell and refractory for secondary combustion air. The refractory is field installed, consisting of minimum 9-inch thick low cement castable mullite-based shotcrete. Multiple tuyere holes are formed tangentially in the cell refractory, creating a cyclonic action.
Improved heater insulation	As described above, the furnace and ductwork will be insulated in keeping with good engineering practices to conserve heat, protect personnel, and to prevent condensation and corrosion.
Flue gas heat recovery	A heat exchanger is installed on the heater exhaust for waste heat recovery and raising combustion air temperatures. The heat exchanger allows the system to gain overall efficiency and permits the firing of green or wet hogged fuel, as received. It consists of vertical tubes and baffles for directing forced draft air around the outside of the tube surface. Heater gases pass through the inside of these tubes and discharge at low temperatures. Outside surfaces are fully insulated with three inches (3") of 700°F mineral wool and weather protected with an aluminum cover.

- 3.2.4 The Permittee shall not process more than 300 MMbf of wood products in the continuous drying kilns (ID Nos. CDK-1 and CDK-2) during any twelve consecutive months.
[391-3-1-.03(2)(c)]
- 3.2.5 Within 180 days of the initial startup of the continuous drying Kilns (ID Nos. CDK-1 and CDK-2), the Permittee shall develop and implement a Site-Specific Kiln Emissions Management Plan (KEMP); identifying general work practice standards to minimize emissions. The program shall be subject to review and modification by the Division. All operational and maintenance checks shall be made, and a record of the findings and corrective actions taken, shall be kept in electronic or manual maintenance logs. With future equipment changes or modifications, the site-specific KEMP may be modified.
[391-3-1-.02(7)(b)7. and 40 CFR 52.21(j)(3)]
- 3.2.6 The Permittee shall operate the selective non-catalytic reduction system (ID No. SNCR) at all times during the operation of the thermal oil heater system (ID No. TOHS). The Permittee shall operate the SNCR at or above the urea injection ratio factor established in accordance with Condition 4.2.11 or during the most recent performance test.
[NO_x PSD Avoidance – 40 CFR 52.21]

- 3.2.7 The Permittee shall operate the multiclone (ID No. MC) and electrostatic precipitator (ID No. ESP) at all times during the operation of the thermal oil heater system (ID No. TOHS), except during the startup and shutdown periods specified in the Startup and Shutdown Plan required in Condition 6.2.11.
[PM/PM₁₀/PM_{2.5} PSD Avoidance – 40 CFR 52.21]
- 3.2.8 The Permittee shall operate the planer mill cyclofilter (ID No. PM) at all times during the operation of the planer mill (ID No. PM).
[PM/PM₁₀/PM_{2.5} PSD Avoidance – 40 CFR 52.21]
- 3.2.9 The Permittee shall not fire any fuel other than wood in the thermal oil heater system (ID No. TOHS).
[391-3-1-.03(2)(c) and 391-3-1-.02(2)(g)2. (subsumed)]
- 3.2.10 The Permittee shall operate the power vent on each of the continuous drying kilns (ID Nos. CDK-1 and CDK-2) at all times when the associated kiln is in operation.
[Georgia Air Toxic Guidelines]
- 3.2.11 Within 90 days after the initial startup of either the continuous drying kilns (ID Nos. CDK-1 and CDK-2), the Permittee shall permanently shut down and remove the existing drying kilns (ID Nos. KL01, KL02, and KL03).
[Georgia Air Toxic Guidelines]

3.3 Equipment Federal Rule Standards

New Conditions

40 CFR 60 Subpart Db

- 3.3.1 The Permittee shall comply with all applicable provisions of the New Source Performance Standards (NSPS), 40 CFR 60 Subpart A – “General Provisions,” and Subpart Db – “Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units,” for the operation of the thermal oil heater system (ID No. TOHS).
[40 CFR 60 Subpart A and Subpart Db]
- 3.3.2 The Permittee shall not cause, let, suffer, permit, or allow any gases from the thermal oil heater system (ID No. TOHS), except during periods of startup and shutdown, which:
 - a. Contain particulate matter (PM) in excess of 0.030 lb/MMBtu heat input.
[40 CFR 60.43b(g); 40 CFR 60.43b(h)(1); and 40 CFR 60.46b(a)]
 - b. Exhibit greater than 20 percent opacity (6-minute average), except for one 6-minute period per hour of not more than 27 percent opacity.
[40 CFR 60.43b(f); 40 CFR 60.43b(g); and 40 CFR 60.46b(a)]

40 CFR 63 Subpart DDDD

- 3.3.3 The Permittee shall comply with all applicable provisions of the National Emission Standards for Hazardous Air Pollutants (NESHAP) as found in 40 CFR 63 Subpart A – “General Provisions,” and Subpart DDDD – “National Emission Standards for Hazardous Air Pollutants: Plywood and Composite Wood Products” for operation of the continuous drying kilns (ID Nos. CDK-1 and CDK-2).
[40 CFR 63 Subpart A and Subpart DDDD]

40 CFR 63 Subpart DDDDD

- 3.3.4 The Permittee shall comply with all applicable provisions of the National Emission Standards for Hazardous Air Pollutants (NESHAP) as found in 40 CFR 63 Subpart A – “General Provisions,” and Subpart DDDDD – “National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters,” for operation of the thermal oil heater system (ID No. TOHS).
[40 CFR 63 Subpart A and Subpart DDDDD]
- 3.3.5 The Permittee shall not cause, let, suffer, permit or allow emissions from the thermal oil heater system (ID No. TOHS, via Multiple Cyclone Collector MC and Electrostatic Precipitator ESP) that contain the following, except during startup and shutdown. During periods of startup and shutdown, the Permittee shall comply with the requirements specified in Conditions 3.3.6 and 3.3.7.
[40 CFR 63.7500(a)(1); 40 CFR 63.7500(a)(2); 40 CFR 63.7500(f); 40 CFR 63.7505(a); Item 1. and Item 12. of Table 1 to 40 CFR 63 Subpart DDDDD; and Item 4. of Table 4 to 40 CFR 63 Subpart DDDDD]
- a. Hydrogen chloride (HCl) in excess of 2.2×10^{-2} pound per MMBtu of heat input (lb/MMBtu).
 - b. Mercury (Hg) in excess of 8.0×10^{-7} lb/MMBtu.
 - c. Filterable particulate matter (PM) in excess of 2.0×10^{-2} lb/MMBtu (or total selected metals (TSM) in excess of 2.9×10^{-5} lb/MMBtu).
 - d. Visible emissions, the opacity of which is higher than 10 percent or the highest hourly average opacity reading measured during the most recent performance test run demonstrating compliance with the PM (or TSM) emission limitation specified in Paragraph c. of this Condition (daily block average).
- 3.3.6 During the startup of the thermal oil heater system (ID No. TOHS):
[40 CFR 63.7500(a)(1); 40 CFR 63.7530(h); 40 CFR 63.7540(d); and Item 5. of Table 3 to 40 CFR 63 Subpart DDDDD]
- a. The Permittee shall operate all continuous monitoring systems (CMS) during startup.

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- b. For startup of a boiler, the Permittee shall use one or a combination of the following clean fuels: Natural gas, synthetic natural gas, propane, other Gas 1 fuels, distillate oil, syngas, ultra-low sulfur diesel, fuel oil-soaked rags, kerosene, hydrogen, paper, cardboard, refinery gas, liquefied petroleum gas, clean dry biomass, and any fuels meeting the appropriate HCl, mercury and TSM emission standards by fuel analysis.
 - c. The Permittee have the option of complying using either of the following work practice standards.
 - i. If the Permittee chooses to comply using definition (1) of “startup” in 40 CFR 63.7575, once the Permittee starts firing fuels that are not clean fuels, the Permittee shall vent emissions to the main stack(s) and engage all of the applicable control devices. Startup ends when steam or heat is supplied for any purpose.
 - ii. If the Permittee chooses to comply using definition (2) of “startup” in 40 CFR 63.7575, once the Permittee starts to feed fuels that are not clean fuels, the Permittee shall vent emissions to the main stack(s) and engage all of the applicable control devices so as to comply with the emission limits within 4 hours of start of supplying useful thermal energy. The Permittee shall engage and operate PM control within one hour of first feeding fuels that are not clean fuels. The Permittee shall start all applicable control devices as expeditiously as possible, but, in any case, when necessary to comply with other standards applicable to the source by a permit limit or a rule other than 40 CFR 63 Subpart DDDDD that require operation of the control devices. The Permittee shall develop and implement a written startup and shutdown plan, as specified in Condition 6.2.11.
 - d. The Permittee shall comply with all applicable emission limits at all times except during startup and shutdown periods at which time the Permittee must meet the work practice standards in Conditions 3.3.6 and 3.3.7. The Permittee shall collect monitoring data during periods of startup, as specified in Condition 5.2.10a. The Permittee shall keep records during periods of startup. The Permittee shall provide reports concerning activities and periods of startup, as specified in Conditions 6.2.13.
- 3.3.7 During shutdown of the thermal oil heater system (ID No. TOHS), the Permittee shall: [40 CFR 63.7500(a)(1); 40 CFR 63.7530(h); 40 CFR 63.7540(d); and Item 6. of Table 3 to 40 CFR 63 Subpart DDDDD]
- a. The Permittee shall operate all CMS during shutdown.
 - b. While firing fuels that are not clean fuels (e.g., painted/pigment-stained/pressure treated wood) during shutdown, the Permittee shall vent emissions to the main stack(s) and operate all applicable control devices, in any case, when necessary to comply with other standards applicable to the boiler that require operation of the control device.

- c. If, in addition to the fuel used prior to initiation of shutdown, another fuel must be used to support the shutdown process, that additional fuel must be one or a combination of the following clean fuels: Natural gas, synthetic natural gas, propane, other Gas 1 fuels, distillate oil, syngas, ultra-low sulfur diesel, refinery gas, and liquefied petroleum gas.
 - d. The Permittee shall comply with all applicable emissions limits at all times except for startup or shutdown periods conforming with this work practice. The Permittee shall collect monitoring data during periods of shutdown, as specified in Condition 5.2.10a. The Permittee shall keep records during periods of shutdown. The Permittee shall provide reports concerning activities and periods of shutdown, as specified in Conditions 6.2.13.
- 3.3.8 The Permittee shall maintain the 30-day rolling average operating load of the thermal oil heater system (ID No. TOHS) such that it does not exceed 110 percent of the highest hourly average operating load recorded during the most recent performance test determined in accordance with Condition 4.2.9b.iii.
[40 CFR 63.7500(a)(2) and Item 7. of Table 4 to 40 CFR 63 Subpart DDDDD]
- 3.3.9 The Permittee shall operate the oxygen trim system of the thermal oil heater system (ID No. TOHS) with the oxygen level set no lower than the lowest hourly average oxygen concentration measured during the most recent CO performance test.
[40 CFR 63.7525(a)(7)]
- 3.3.10 The Permittee shall, at all times, operate and maintain the thermal oil heater system (ID No. TOHS), including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Division that may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the boiler.
[40 CFR 63.7500(a)(3)]

3.4 Equipment SIP Rule Standards

New Conditions

- 3.4.4 The Permittee shall not cause, let, suffer, permit or allow emissions from the sawmill and green end operations (ID No. FUG-SM), continuous drying kilns (ID Nos. CDK-1 and CDK-2), and planer mill (ID No. PM), the opacity of which is equal to or greater than forty (40) percent.
[391-3-1-.02(2)(b)1.]

- 3.4.5 The Permittee shall not cause, let, suffer, permit, or allow any emissions from the thermal oil heater system (ID No. TOHS) which:
- a. Contain fly ash and/or other particulate matter in amounts equal to or exceeding the rate derived from $P = 0.5(10/R)^{0.5}$ where R equals heat input rate in million BTU per hour and P equals the allowable emission rate in pounds per million BTU.
[391-3-1-.02(2)(d)2.(ii)]
 - b. Exhibit visible emissions, the opacity of which is equal to or greater than 20 percent except for one six minute period per hour of not more than 27 percent opacity.
[391-3-1-.02(2)(d)3.]
- 3.4.6 The Permittee shall not cause, let, suffer, permit, or allow the emission from the sawmill and green end operations (ID No. FUG-SM), continuous drying kilns (ID Nos. CDK-1 and CDK-2), and planer mill (ID No. PM), each, particulate matter (PM) in total quantities equal to or exceeding the allowable rate as calculated using the applicable equation below, unless otherwise specified in this Permit.
[391-3-1-.02(2)(e)1.(i)]
- a. $E = 4.1 * P^{0.67}$; for process input weight rate up to and including 30 tons per hour.
 - b. $E = 55 * P^{0.11} - 40$; for process input weight rate above 30 tons per hour.

Where: E = allowable emission rate in pounds per hour;
P = process input weight rate in tons per hour.

3.5 Equipment Standards Not Covered by a Federal or SIP Rule and Not Instituted as an Emission Cap or Operating Limit

None applicable.

PART 4.0 REQUIREMENTS FOR TESTING**4.1 General Testing Requirements****Modified Condition**

- 4.1.3 Performance and compliance tests shall be conducted and data reduced in accordance with applicable procedures and methods specified in the Division's Procedures for Testing and Monitoring Sources of Air Pollutants. The methods for the determination of compliance with emission limits listed under Sections 3.2, 3.3, 3.4 and 3.5 which pertain to the emission units listed in Section 3.1 are as follows:
- a. Method 1 shall be used for the determination of sample point locations and number of traverse points.
 - b. Method 2, 2F, or 2G shall be used for the determination of stack gas velocity and flow rate.
[Items 1. through 4. of Table 5 to 40 CFR 63 Subpart DDDDD]
 - c. Method 3A or 3B shall be used for the determination of stack gas molecular weight. Method 3A or 3B shall also be used for the determination of oxygen or carbon dioxide concentration of the stack gas. ASTM D6522-00 is also approved to be used for the determination of oxygen concentration of the stack gas for the 40 CFR 63 Subpart DDDDD CO limit.
[Items 1. through 5. of Table 5 to 40 CFR 63 Subpart DDDDD]
 - d. Method 4 shall be used for the determination of stack gas moisture.
[Items 1. through 5. of Table 5 to 40 CFR 63 Subpart DDDDD]
 - e. Method 5 or 17, as applicable, shall be used for the determination of PM emissions.
[Item 1. of Table 5 to 40 CFR 63 Subpart DDDDD]
 - f. Method 9 and the Procedures of Section 1.3 of the above referenced document shall be used for the determination of the opacity of visible emissions.
 - g. Method 10, with a measurement span value of 2 times the concentration of the 40 CFR 63 Subpart CO emission limit, shall be used for the determination of CO emission concentration.
[Item 5. of Table 5 to 40 CFR 63 Subpart DDDDD]
 - h. Method 19 shall be used, when applicable, to convert PM (or TSM), NO_x, CO, sulfur dioxide, HCl, and Hg concentrations (i.e., grains/dscf for PM; ppm for gaseous pollutants), as determined using other methods specified in this section, to emission rates (i.e., lb/MMBtu).
[Items 1. through 4. of Table 5 to 40 CFR 63 Subpart DDDDD]
 - i. Method 26 or 26A shall be used for the determination of HCl emission concentration.
[Item 3. of Table 5 to 40 CFR 63 Subpart DDDDD]

- j. Method 29, 30A, or 30B shall be used for the determination of Hg emission concentration.
[Item 4. of Table 5 to 40 CFR 63 Subpart DDDDD]

Minor changes in methodology may be specified or approved by the Director or his designee when necessitated by process variables, changes in facility design, or improvement or corrections that, in his opinion, render those methods or procedures, or portions thereof, more reliable.

[391-3-1-.02(3)(a)]

4.2 Specific Testing Requirements

New Conditions

PSD BACT Limits

- 4.2.1 Within 60 days after achieving the maximum production rate at which the thermal oil heater system (ID No. TOHS) will be operated, but not later than 180 days after the initial startup, the Permittee shall conduct the following performance tests. The results of the performance test(s) shall be submitted to the Division within 60 days of the completion of testing.
[391-3-1-.02(6)(b)1. and 40 CFR 70.6(a)(3)(i)]
 - a. A performance test for VOC to determine compliance with the VOC BACT emission limit specified in Condition 3.2.3a.
 - b. A performance test for CO to determine compliance with the CO BACT emission limit specified in Condition 3.2.3b.
[40 CFR 63.7505(c); 40 CFR 63.7510(f); and 40 CFR 63.7520(a)]
- 4.2.2 The Permittee shall repeat the CO performance test specified in Condition 4.2.1b. according to the following schedule:
[391-3-1-.02(6)(b)1; 40 CFR 63.7505(c); 40 CFR 63.7515(a) through (c); 40 CFR 63.7520(a); and 40 CFR 70.6(a)(3)(i)]
 - a. Subsequent CO performance test must be conducted on an annual basis, except as specified in Paragraphs b. and c. of this Condition. Annual performance tests must be completed no more than 13 months after the previous performance test.
 - b. If the CO performance tests for at least 2 consecutive years are at or below 75 percent of the CO BACT emission limit specified in Condition 3.2.3b., and if there are no changes in the operation of the associated boiler or air pollution control equipment that could increase emissions, the Permittee may choose to conduct performance tests for the pollutant every third year. Each such performance test must be conducted no more than 37 months after the previous performance test.

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- c. If a CO performance test shows CO emissions exceeded the CO BACT emission limit or 75 percent of the CO BACT emission limit, the Permittee shall conduct annual CO performance tests until all performance tests over a consecutive 2-year period meet the required level (at or below 75 percent of the emission limit).
- 4.2.3 The Permittee shall repeat the VOC performance tests specified in Condition 4.2.1a. within 60 days after each 5-year tune-up specified in Condition 5.2.7 and demonstrate compliance with the VOC BACT emission limit specified in Condition 3.2.3a.
[391-3-1-.02(6)(b)1. and 40 CFR 70.6(a)(3)(i)]

40 CFR 60 Subpart Db

- 4.2.4 Within 60 days after achieving the maximum production rate at which the thermal oil heater system (ID No. TOHS) will be operated, but not later than 180 days after the initial startup, the Permittee shall conduct the following performance tests. The results of the performance test(s) shall be submitted to the Division within 60 days of the completion of testing.
[391-3-1-.02(6)(b)1.; 40 CFR 60.46b(b) and (d); and 40 CFR 70.6(a)(3)(i)]
- a. A performance test for PM to determine compliance with the PM emission limit specified in Condition 3.3.2a.
 - b. A performance test for visible emissions to determine compliance with the visible emission limit specified in Condition 3.3.2b.

40 CFR 63 Subpart DDDDD

- 4.2.5 Within 60 days after achieving the maximum production rate at which the thermal oil heater system (ID No. TOHS) will be operated, but not later than 180 days after the initial startup, the Permittee shall conduct the following performance tests on TOHS to demonstrate compliance with the emission limits specified in Conditions 3.3.5a. through c.:
[391-3-1-.02(6)(b)1; 40 CFR 63.7505(c); 40 CFR 63.7510(f); 40 CFR 63.7520(a); Items 1 and 12 of Table 1 to 40 CFR 63 Subpart DDDDD; and 40 CFR 70.6(a)(3)(i)]
- a. A performance test for HCl. Samples must be collected at a minimum of 1 dry standard cubic meter (dscm) per run for Method 26A or at a minimum of 120 liters per run for Method 26.
 - b. A performance test for Hg. Samples must be collected at a minimum of 4 dscm per run for Method 29 or at a minimum sample as specified in Method 30A or Method 30B.
 - c. A performance test for filterable PM (or TSM). Samples must be collected at a minimum of 2 dscm per run.

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- 4.2.6 The Permittee shall repeat the performance tests specified in Condition 4.2.5 according to the following schedule:
[391-3-1-.02(6)(b)1; 40 CFR 63.7505(c); 40 CFR 63.7515(a) through (c); 40 CFR 63.7520(a); and 40 CFR 70.6(a)(3)(i)]
- a. Subsequent performance test must be conducted on an annual basis, except as specified in Paragraphs b. and c. of this Condition. Annual performance tests must be completed no more than 13 months after the previous performance test.
 - b. If the performance tests for a given pollutant for at least 2 consecutive years are at or below 75 percent of the emission limit for the pollutant, and if there are no changes in the operation of the associated boiler or air pollution control equipment that could increase emissions, the Permittee may choose to conduct performance tests for the pollutant every third year. Each such performance test must be conducted no more than 37 months after the previous performance test. The requirement to test at maximum chloride input level is waived unless the stack test is conducted for HCl. The requirement to test at maximum mercury input level is waived unless the stack test is conducted for mercury. The requirement to test at maximum TSM input level is waived unless the stack test is conducted for TSM.
 - c. If a performance test shows emissions exceeded the emission limit or 75 percent of the emission limit for a pollutant, the Permittee shall conduct annual performance tests for that pollutant until all performance tests over a consecutive 2-year period meet the required level (at or below 75 percent of the emission limit).
- 4.2.7 The Permittee shall follow the following procedures for conducting the performance tests required by Conditions 4.2.1b., 4.2.2, 4.2.5 and 4.2.6:
[391-3-1-.02(6)(b)1; 40 CFR 7510(a)(1), (c), and (d); 40 CFR 63.7520; and 40 CFR 70.6(a)(3)(i)]
- a. The Permittee shall conduct all performance tests according to 40 CFR 63.7(c), (d), (f), and (h). The Permittee shall also develop a site-specific stack test plan according to the requirements in 40 CFR 63.7(c). The Permittee shall conduct all performance tests under such conditions as the Division specifies to the Permittee based on the representative performance of the boiler for the period being tested. Upon request, the Permittee shall make available to the Division such records as may be necessary to determine the conditions of the performance tests.
 - b. The Permittee shall conduct each performance test according to the requirements in Table 5 to 40 CFR 63 Subpart DDDDD, which are incorporated into Condition 4.1.3.
 - c. The Permittee shall conduct each performance test under the specific conditions listed in Tables 5 and 7 to 40 CFR 63 Subpart DDDDD. The Permittee shall conduct performance tests at representative operating load conditions while burning the type of fuel or mixture of fuels that has the highest content of chlorine and mercury, and TSM if the Permittee opts to comply with the TSM alternative standard and the Permittee shall demonstrate initial compliance and establish the operating limits based on these performance tests. These requirements could result in the need to conduct more than

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one performance test. Following each performance test and until the next performance test, the Permittee shall comply with the operating limit for operating load conditions established in accordance with Condition 4.2.9b.

- d. The Permittee shall conduct a minimum of three separate test runs for each performance test, as specified in 40 CFR 63.7(e)(3). Each test run must comply with the minimum applicable sampling times or volumes specified in Conditions 4.2.5a., b., and c.
- e. To determine compliance with the emission limits, the Permittee shall use the F-Factor methodology and equations in sections 12.2 and 12.3 of EPA Method 19 at 40 CFR 60, appendix A-7 of this chapter to convert the measured PM, HCl, Hg, and TSM concentrations that result from the performance test to pounds per million Btu heat input emission rates.
- f. If measurement results for any pollutant are reported as below the method detection level (e.g., laboratory analytical results for one or more sample components are below the method defined analytical detection level), the Permittee shall use the method detection level as the measured emissions level for that pollutant in calculating compliance. The measured result for a multiple component analysis (e.g., analytical values for multiple Method 29 fractions both for individual HAP metals and for total HAP metals) may include a combination of method detection level data and analytical data reported above the method detection level.

4.2.8 The Permittee shall repeat the performance tests specified in Conditions 4.2.1b. and 4.2.5 to demonstrate compliance with the emission limits specified in Conditions 3.2.3b. and 3.3.5a. through c. if the fuel for the thermal oil heater system (ID No. TOHS) is changed/switched. The Permittee is exempt from the associated testing requirements for fuel switch if the Permittee is able to show that the new fuel(s) does (do) not increase the chlorine, mercury, or TSM (if alternative TSM limits in Conditions 3.3.3d. are opted) input into the unit through the results of fuel analysis, conducted in accordance with 40 CFR 63.7521 and 40 CFR 63.7540(a)(4) and (a)(6).

[391-3-1-.02(6)(b)1; 40 CFR 63.7530(b); and 40 CFR 70.6(a)(3)(i)]

4.2.9 During the most recent performance tests required by Conditions 4.2.1b., 4.2.2, 4.2.5, and 4.2.6, the Permittee shall establish the following limits for the thermal oil heater system (ID No. TOHS) according to the following procedures and 40 CFR 63.7530.

[391-3-1-.02(6)(b)1 and 40 CFR 70.6(a)(3)(i)]

- a. A site-specific maximum opacity level (operating limit).
[40 CFR 63.7510(a)(3); 40 CFR 63.7520(c); 40 CFR 63.7530(a) and (b); Item 4.a. of Table 4 to 40 CFR 63 Subpart DDDDD; and Item 1.c. of Table 7 to 40 CFR 63 Subpart DDDDD]
- i. The Permittee shall collect opacity readings every 15 minutes during the entire period of the PM performance tests.

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- ii. The Permittee shall determine the average hourly opacity reading for each PM performance test run by computing the hourly averages using all of the 15-minute readings taken during each performance test run.
 - iii. The Permittee shall determine the highest hourly average opacity reading measured during the test run demonstrating compliance with the PM (or TSM) emission limitation.
 - b. A unit-specific for maximum operating load (operating limit).
[40 CFR 63.7510(a)(3); 40 CFR 63.7520(c); 40 CFR 63.7530(a) and (b); Item 7. of Table 4 to 40 CFR 63 Subpart DDDDD; and Item 5.a. of Table 7 to 40 CFR 63 Subpart DDDDD]
 - i. The Permittee shall collect operating load or steam generation data every 15 minutes during the entire period of the performance test.
 - ii. The Permittee shall determine the average operating load by computing the hourly averages using all of the 15-minute readings taken during each performance test.
 - iii. The Permittee shall determine the highest hourly average of the three test run averages during the performance test, and multiply this by 1.1 (110 percent) as the operating limit.
 - c. A unit-specific limit for minimum oxygen level.
[40 CFR 63.7525(a)(7)]
 - i. The Permittee shall collect oxygen data every 15 minutes during the entire period of the performance tests.
 - ii. The Permittee shall determine the hourly average oxygen concentration by computing the hourly averages using all of the 15-minute readings taken during each performance test.
 - iii. The Permittee shall determine the lowest hourly average established during the performance test as the minimum operating limit.
 - iv. For a minimum oxygen level, if the Permittee conducts multiple performance tests, the Permittee shall set the minimum oxygen level at the lower of the minimum values established during the performance tests.
[40 CFR 63.7530(b)(4)(viii)]
- 4.2.10 The Permittee shall report the results of performance tests required by Conditions 4.2.1b., 4.2.2, 4.2.5, 4.2.6, and 4.2.8 and any associated fuel analyses within 60 days after the completion of the performance tests. This report must also verify that the operating limits for the boiler have not changed or provide documentation of revised operating limits established in accordance with Condition 4.2.9.
[391-3-1-.02(6)(b)1; 40 CFR 63.7515(f); and 40 CFR 70.6(a)(3)(i)]

GA State Requirement

- 4.2.11 Within 60 days after achieving the maximum production rate at which the thermal oil heater system (ID No. TOHS) will be operated, but not later than 180 days after the initial startup, the Permittee shall conduct a performance test for NO_x from TOHS to verify its NO_x emission factor of 0.127 lb/MMBtu.
[391-3-1-.02(6)(b)1 and 40 CFR 70.6(a)(3)(i)]

During the NO_x performance test, the Permittee shall determine the average urea injection ratio factor, in pound of urea injected per MMBtu of heat input to TOHS (lb urea/MMBtu), to the selective non-catalytic reduction system (ID No. SNCR) that demonstrates compliance with the 0.127-lb/MMBtu NO_x emission factor.

PART 5.0 REQUIREMENTS FOR MONITORING (Related to Data Collection)**5.2 Specific Monitoring Requirements****New Conditions**GA State Requirements

- 5.2.2 The Permittee shall install, calibrate, maintain, and operate a system to continuously monitor and record the urea injection rate to the selective non-catalytic reduction system (ID No. SNCR). Where such performance specification(s) exist, the system shall meet the applicable performance specification(s) of the Division's monitoring requirements.
[391-3-1-.02(6)(b)1 and 40 CFR 70.6(a)(3)(i)]
- 5.2.3 The Permittee shall install, calibrate, maintain, and operate monitoring devices for the measurement of the indicated parameters on the following equipment. Data shall be recorded at the frequency specified below. Where such performance specification(s) exist, each system shall meet the applicable performance specification(s) of the Division's monitoring requirements.
[391-3-1-.02(6)(b)1 and 40 CFR 70.6(a)(3)(i)]
- A device for the measurement of total secondary voltage (kilovolts) of each field of the electrostatic precipitator (ID No. ESP). Such device shall have a required accuracy of approximately 2%. Data shall be recorded hourly when the thermal oil heater system (ID No. TOHS) is in operation.
 - A device for the measurement of total secondary current (milliamps) of each field of the electrostatic precipitator (ID No. ESP). Such device shall have a required accuracy of approximately 2%. Data shall be recorded hourly when the thermal oil heater system (ID No. TOHS) is in operation.
 - A device for the measurement of pressure drop across the cyclofilter (ID No. PM). Data shall be recorded weekly.
- 5.2.4 The Permittee shall, using the hourly secondary voltages and secondary currents, obtained in accordance with Conditions 5.2.3a and b, and the following equation, determine and record the total secondary power for each field of the electrostatic precipitator (ID No. ESP):
[40 CFR 70.6(a)(3)(i) and 391-3-1-.02(6)(b)1]

$$P_t = \sum_{i=1}^n (V_i \times I_i)$$

- Where:
- P_t = Total ESP power (watts)
 - V_i = Secondary volts (kV), ESP field i
 - I_i = Secondary current (ma), ESP field I
 - n = Total number of fields

These records shall be kept in a form suitable for inspection or submittal to the Division.

- 5.2.5 The Permittee shall, for each week or portion of each week of operation of the thermal oil heater system (ID No. TOHS) and the planer mill (ID No. PM), inspect the exterior of the multiple cyclone collector (ID No. MC) and cyclofilter (ID No. PM), for holes in the body or evidence of malfunction in the interior of the cyclones. Any adverse condition discovered by this inspection shall be corrected in the most expedient manner possible. The Permittee shall record any adverse conditions discovered by the inspection and note the corrective action taken.
[391-3-1-.02(6)(b)1 and 40 CFR 70.6(a)(3)(i)]

40 CFR 60 Subpart Db

- 5.2.6 The Permittee shall install, calibrate, maintain, and operate a Continuous Opacity Monitoring System (COMS) for measuring the opacity of emissions discharged into the atmosphere from the thermal oil heater system (ID No. TOHS) and maintain records of opacity. The procedures under 40 CFR 60.13 shall be followed for installation, evaluation, and operation of the COMS. The span value for a COMS shall be between 60 and 80 percent.
[391-3-1-.02(6)(b)1; 40 CFR 60.48b(a); 40 CFR 60.48b(e)(1); 40 CFR 60.49b(f); and 40 CFR 70.6(a)(3)(i)]

40 CFR 63 Subpart DDDDD

- 5.2.7 The Permittee shall conduct a tune-up of the thermal oil heater system (ID No. TOHS) every 5 years. Each 5-year tune-up specified in 40 CFR 63.7540(a)(12) must be conducted no more than 61 months after the previous tune-up. The 5-year tune-up shall include the following:
[391-3-1-.02(6)(b)1(i); 40 CFR 63.7500(a)(1); 40 CFR 63.7510(g); 40 CFR 63.7515(d); 40 CFR 63.7530(h); 40 CFR 63.7540(a)(12); Item 1. of Table 3 to 40 CFR 63 Subpart DDDDD; and 40 CFR 70.6(a)(3)(i)]
- a. As applicable, inspect the burner, and clean or replace any components of the burner as necessary (the Permittee may perform the burner inspection any time prior to the tune-up or delay the burner inspection until the next scheduled unit shutdown). At units where entry into a piece of process equipment or into a storage vessel is required to complete the tune-up inspections, inspections are required only during planned entries into the storage vessel or process equipment.
 - b. Inspect the flame pattern, as applicable, and adjust the burner as necessary to optimize the flame pattern. The adjustment should be consistent with the manufacturer's specifications, if available.
 - c. Inspect the system controlling the air-to-fuel ratio, as applicable, and ensure that it is correctly calibrated and functioning properly (the Permittee may delay the inspection until the next scheduled unit shutdown).
 - d. Optimize total emissions of CO. This optimization should be consistent with the manufacturer's specifications, if available, and with any NOx requirement to which the unit is subject.

- e. Measure the concentrations in the effluent stream of CO in parts per million, by volume, and oxygen in volume percent, before and after the adjustments are made (measurements may be either on a dry or wet basis, as long as it is the same basis before and after the adjustments are made). Measurements may be taken using a portable CO analyzer.
- f. Maintain on-site and submit a report containing the information in Subparagraphs f.i. through f.iii. below.
 - i. The concentrations of CO in the effluent stream in parts per million by volume, and oxygen in volume percent, measured at high fire or typical operating load, before and after the tune-up of the boiler or process heater.
 - ii. A description of any corrective actions taken as a part of the tune-up.
 - iii. The type and amount of fuel used over the 12 months prior to the tune-up, but only if the unit was physically and legally capable of using more than one type of fuel during that period. Units sharing a fuel meter may estimate the fuel used by each unit.

The Permittee may delay the burner inspection specified in Paragraph a. of this Condition until the next scheduled or unscheduled unit shutdown, but the Permittee must inspect each burner at least once every 72 months.

[40 CFR 63.7540(a)(12)]

If TOHS is not operating on the required date for a tune-up, the tune-up must be conducted within 30 calendar days of startup.

[40 CFR 63.7540(a)(13)]

- 5.2.8 The Permittee shall operate the COMS specified in Condition 5.2.6 to continuously monitor and record opacity for the thermal oil heater system (ID No. TOHS) and comply with the following requirements and the applicable performance specification(s) of the Division's monitoring requirements.

[391-3-1-.02(6)(b)1; 40 CFR 63.7510(a)(4); 40 CFR 63.7525(c); 40 CFR 63.7540(a); Item 1.a. of Table 8 to 40 CFR 63 Subpart DDDDD; and 40 CFR 70.6(a)(3)(i)]

- a. The Permittee shall operate and maintain the COMS in continuous operation according to the site-specific monitoring plan specified in Condition 6.2.10.
[40 CFR 63.7505(d)(4) and 40 CFR 63.7535(a)]
- b. The COMS must be installed, operated, and maintained according to Performance Specification 1 at appendix B to 40 CFR 60.
[40 CFR 63.7525(c)(1)]
- c. The Permittee shall conduct a performance evaluation of the COMS in accordance with the requirements in 40 CFR 63.8(e). Performance Specification 1 at appendix B to 40 CFR 60, and the site-specific monitoring plan specified in Condition 6.2.10.

[40 CFR 63.7505(d)(3) and 40 CFR 63.7525(c)(2)]

- d. As specified in 40 CFR 63.8(c)(4)(i), the COMS must complete a minimum of one cycle of sampling and analyzing for each successive 10-second period and one cycle of data recording for each successive 6-minute period.
[40 CFR 63.7525(c)(3)]
- e. The COMS data must be reduced to 6-minute averages.
[40 CFR 63.7525(c)(4) and Item 1.b. of Table 8 to 40 CFR 63 Subpart DDDDD]
- f. The Permittee shall include in the site-specific monitoring plan procedures and acceptance criteria for operating and maintaining the COMS according to the requirements in 40 CFR 63.8(d). At a minimum, the monitoring plan must include a daily calibration drift assessment, a quarterly performance audit, and an annual zero alignment audit of the COMS.
[40 CFR 63.7525(c)(5)]
- g. The Permittee shall operate and maintain the COMS according to the requirements in the monitoring plan and the requirements of 40 CFR 63.8(e). The Permittee shall identify periods the COMS is out of control including any periods that the COMS fails to pass a daily calibration drift assessment, a quarterly performance audit, or an annual zero alignment audit. Any 6-minute period for which the monitoring system is out of control and data are not available for a required calculation constitutes a deviation from the monitoring requirements.
[40 CFR 63.7525(c)(6)]
- h. The Permittee shall determine and record all the 6-minute averages (and daily block averages as applicable) collected for periods during which the COMS is not out of control.
[40 CFR 63.7525(c)(7)]
- i. The Permittee shall maintain daily block average opacity to less than or equal to the visible emission limits specified in Condition 3.3.5d.
[Item 1.c. of Table 8 to 40 CFR 63 Subpart DDDDD]

- 5.2.9 The Permittee shall install, calibrate, maintain, and operate a continuous monitoring system (CMS) to continuously monitor and record the boiler operating load (e.g., fuel consumption rate, steam generation rate, etc.) on the thermal oil heater system (ID No. TOHS). Where such performance specification(s) exist, the system shall meet the following requirements and the applicable performance specification(s) of the Division's monitoring requirements.
[391-3-1-.02(6)(b)1(i); 40 CFR 63.7525(d); 40 CFR 63.7540(a); and 40 CFR 70.6(a)(3)(i)]

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- a. The CMS must complete a minimum of one cycle of operation every 15-minutes. The Permittee shall have a minimum of four successive cycles of operation, one representing each of the four 15-minute periods in an hour, to have a valid hour of data. [Item 10.a. of Table 8 to 40 CFR 63 Subpart DDDDD]
 - b. The Permittee shall operate the CMS in accordance with Condition 5.2.10a. and comply with the data calculation requirements specified in Condition 5.2.10b.
 - c. Any 15-minute period for which the monitoring system is out-of-control and data are not available for a required calculation constitutes a deviation from the monitoring requirements. Other situations that constitute a monitoring deviation are specified in Condition 5.2.10c.
 - d. The Permittee shall determine the 30-day rolling average of all recorded readings, except as provided in Condition 5.2.10b. [Item 10.b. of Table 8 to 40 CFR 63 Subpart DDDDD]
 - e. The Permittee shall record the results of each inspection, calibration, and validation check.
 - f. The Permittee shall maintain the 30-day rolling average operating load such that it does not exceed 110 percent of the highest hourly average operating load recorded in accordance with Condition 4.2.9b.iii. [Item 10.c. of Table 8 to 40 CFR 63 Subpart DDDDD]
- 5.2.10 For the monitoring devices required by Conditions 5.2.8 and 5.2.9:
[391-3-1-.02(6)(b)1(i); 40 CFR 63.7535(b) through (d); and 40 CFR 70.6(a)(3)(i)]
- a. The Permittee shall operate the monitoring system and collect data at all required intervals at all times that the boiler is operating and compliance is required, except for periods of monitoring system malfunctions or out of control periods (see 40 CFR 63.8(c)(7)), and required monitoring system quality assurance or control activities, including, as applicable, calibration checks, required zero and span adjustments, and scheduled CMS maintenance as defined in the site-specific monitoring plan. A monitoring system malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring system to provide valid data. Monitoring system failures that are caused in part by poor maintenance or careless operation are not malfunctions. The Permittee shall complete monitoring system repairs in response to monitoring system malfunctions or out-of-control periods and to return the monitoring system to operation as expeditiously as practicable.
 - b. The Permittee shall not use data recorded during periods of startup and shutdown, monitoring system malfunctions or out-of-control periods, repairs associated with monitoring system malfunctions or out-of-control periods, or required monitoring system quality assurance or control activities in data averages and calculations used to report emissions or operating levels. The Permittee shall record and make available upon request results of CMS performance audits and dates and duration of periods when the CMS is out of control to completion of the corrective actions necessary to return

the CMS to operation consistent with the site-specific monitoring plan. The Permittee shall use all the data collected during all other periods in assessing compliance and the operation of the control device and associated control system.

- c. Except for periods of monitoring system malfunctions, repairs associated with monitoring system malfunctions, and required monitoring system quality assurance or quality control activities (including, as applicable, system accuracy audits, calibration checks, and required zero and span adjustments), failure to collect required data is a deviation of the monitoring requirements. In calculating monitoring results, do not use any data collected during periods of startup and shutdown, when the monitoring system is out of control as specified in the site-specific monitoring plan, while conducting repairs associated with periods when the monitoring system is out of control, or while conducting required monitoring system quality assurance or quality control activities. The Permittee shall calculate monitoring results using all other monitoring data collected while the process is operating. The Permittee shall report all periods when the monitoring system is out of control in the semi-annual report.

PART 6.0 OTHER RECORD KEEPING AND REPORTING REQUIREMENTS**6.1 General Record Keeping and Reporting Requirements****Modified Condition**

6.1.4 The Permittee shall submit a written report containing any excess emissions, exceedances, and/or excursions as described in this permit and any monitor malfunctions for each **quarterly** period ending March 31, June 30, September 30, and December 31 of each year. All reports shall be postmarked by May 30, August 29, November 29, and February 28, respectively following each reporting period. In the event that there have not been any excess emissions, exceedances, excursions or malfunctions during a reporting period, the report should so state. Otherwise, the contents of each report shall be as specified by the Division's Procedures for Testing and Monitoring Sources of Air Pollutants and shall contain the following:

[391-3-1-.02(6)(b)1 and 40 CFR 70.6(a)(3)(iii)(A)]

- a. A summary report of excess emissions, exceedances and excursions, and monitor downtime, in accordance with Section 1.5(c) and (d) of the above referenced document, including any failure to follow required work practice procedures.
- b. Total process operating time during each reporting period.
- c. The magnitude of all excess emissions, exceedances and excursions computed in accordance with the applicable definitions as determined by the Director, and any conversion factors used, and the date and time of the commencement and completion of each time period of occurrence.
- d. Specific identification of each period of such excess emissions, exceedances, and excursions that occur during startups, shutdowns, or malfunctions of the affected facility. Include the nature and cause of any malfunction (if known), the corrective action taken or preventive measures adopted.
- e. The date and time identifying each period during which any required monitoring system or device was inoperative (including periods of malfunction) except for zero and span checks, and the nature of the repairs, adjustments, or replacement. When the monitoring system or device has not been inoperative, repaired, or adjusted, such information shall be stated in the report.
- f. Certification by a Responsible Official that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.

New Condition

6.1.8 For the purpose of reporting excess emissions, exceedances or excursions in the report required in Condition 6.1.4, the following excess emissions, exceedances, and excursions shall be reported:

[391-3-1-.02(6)(b)1 and 40 CFR 70.6(a)(3)(i)]

a. Excess emissions: (means for the purpose of this Condition and Condition 6.1.4, any condition that is detected by monitoring or record keeping which is specifically defined, or stated to be, excess emissions by an applicable requirement)

i. Any six-minute average opacity, as recorded by the COMS specified in Condition 5.2.6, that exceeds 20 percent, except that one six-minute average per hour of up to 27 percent need not be reported.

[40 CFR 60.49b(h)(1) and (3)]

b. Exceedances: (means for the purpose of this Condition and Condition 6.1.4, any condition that is detected by monitoring or record keeping that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) do not meet the applicable emission limitation or standard consistent with the averaging period specified for averaging the results of the monitoring)

i. Any rolling 12-month total of Total GHG emissions, determined in accordance with Condition 6.2.3, from the thermal oil heater system (ID No. TOHS), exceeding 126,500 tons CO_{2(e)}.

ii. Any time any of the energy efficiency options specified in Condition 3.2.3d. is not complied with.

iii. Any twelve consecutive month period for which the total amount of lumber dried in the continuous drying kilns (ID Nos. CDK-1 and CDK-2), combined, exceeds 300 million board feet.

iv. Any time the control devices specified in Conditions 3.2.6 through 3.2.8 were not operated in accordance with the requirements specified in these conditions.

v. Any time that the fuel burned in the thermal oil heater system (ID No. TOHS) does not meet the requirements specified in Condition 3.2.9.

c. Excursions: (means for the purpose of this Condition and Condition 6.1.4, any departure from an indicator range or value established for monitoring consistent with any averaging period specified for averaging the results of the monitoring)

i. Any three-hour period during which the average urea injection ratio is less than ninety (90) percent of the average urea injection ratio factor (in lb urea/MMBtu) established during the initial performance test required by Condition 4.2.11.

- ii. Any three-hour average total secondary power input to the electrostatic precipitator (ID No. ESP), recorded in accordance with Condition 5.2.4, that indicates that, except during the startup and shutdown of the thermal oil heater system (ID No. TOHS), ESP is not operated during operation of TOHS.
- iii. Any weekly measurements of pressure drop across the cyclofilter (ID No. PM) is outside the manufacturer's recommended range.
- iv. Any adverse condition(s) discovered by the weekly inspections specified in Condition 5.2.5.
- v. Any time the power vents of the continuous drying kilns (ID Nos. CDK-1 and CDK-2) are not operated while the associated kiln is in operation.
- vi. Any daily block COMS average opacity, recorded in accordance with Condition 5.2.8h., that is greater than the opacity operating limits specified in Condition 3.3.5d.
[40 CFR 63.7540(a)(1) and 40 CFR 63.7540(b)]
- vii. Any 30-day rolling average boiler operating load, recorded in accordance with Condition 5.2.9d., that exceeds 110 percent of the highest hourly average operating load recorded in accordance with Condition 4.2.9b.iii.
[40 CFR 63.7540(a)(1) and 40 CFR 63.7540(b)]
- viii. Any operation of the thermal oil heater system (ID No. TOHS) with an oxygen trim system set point below the lowest hourly average oxygen concentration measured during the most recent CO performance test.

6.2 Specific Record Keeping and Reporting Requirements

New Conditions

PSD BACT Limits

- 6.2.1 The Permittee shall record and maintain the records of operating hours per calendar month for the operation of the thermal oil heater system (ID No. TOHS). The records shall be available for inspection or submittal to the Division, upon request.
[391-3-1-.02(6)(b)1(i) and 40 CFR 70.6(a)(3)(ii)(B)]
- 6.2.2 The Permittee shall calculate the Total GHG emissions (tons) from the thermal oil heater system (ID No. TOHS) for each calendar month. Total GHG emissions shall be calculated using the records required by Condition 6.2.1 and the following equation:
[391-3-1-.02(6)(b)1(i) and 40 CFR 70.6(a)(3)(ii)(B)]

$$\text{Total GHG} = 28,820 * \text{HR} / 2,000$$

- b. Certification that a final inspection has shown that construction has been completed in accordance with the application, plans, specifications, and supporting documents submitted in support of the Permit within 60 days after the initial startup.
- c. The actual date when the existing drying kilns (ID Nos. KL01, KL02, and KL03) permanently cease operation within 30 days after such date.
- d. The design heat input capacity of the thermal oil heater system (ID No. TOHS) and identification of the fuels to be combusted in TOHS.
[40 CFR 60.49b(a)(1)]

- 6.2.8 The Permittee shall maintain records of the total secondary power input to the electrostatic precipitator (ID No. ESP), reduced to 3-hour rolling averages, recorded in accordance with Condition 5.2.4. The records shall be maintained in a form suitable for inspection or submittal to the Division. Such records shall include a description of any excursions specified in Condition 6.1.7c.ii., along with the date and time of occurrence and a description of any corrective actions taken.
[391-3-1-.02(6)(b)1 and 40 CFR 70.6(a)(3)(i)]

40 CFR 60 Subpart Db

- 6.2.9 The Permittee shall record and maintain daily records of the amounts of wood combusted in the thermal oil heater system (ID No. TOHS). These records shall be maintained in a format suitable for inspection or submittal at all times.
[391-3-1-.02(6)(b)1; 40 CFR 60.49b(d)(2); and 40 CFR 70.6(a)(3)(i)]

40 CFR 63 Subpart DDDDD

- 6.2.10 For the COMS required by Condition 5.2.8, the Permittee shall develop a site-specific monitoring plan that addresses design, data collection, and the quality assurance and quality control elements outlined in 40 CFR 63.8(d) and the elements described in Paragraphs a. through f. below.
[391-3-1-.02(6)(b)1(i); 40 CFR 63.7505(d)(1) and (2); and 40 CFR 70.6(a)(3)(i)]
- a. Installation of the COMS sampling probe or other interface at a measurement location relative to each affected process unit such that the measurement is representative of control of the exhaust emissions (e.g., on or downstream of the last control device).
 - b. Performance and equipment specifications for the sample interface, the pollutant concentration or parametric signal analyzer, and the data collection and reduction systems.
 - c. Performance evaluation procedures and acceptance criteria (e.g., calibrations, accuracy audits, analytical drift).
 - d. Ongoing operation and maintenance procedures in accordance with the general requirements of 40 CFR 63.8(c)(1)(ii), (c)(3), and (c)(4)(ii).

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- e. Ongoing data quality assurance procedures in accordance with the general requirements of 40 CFR 63.8(d).
 - f. Ongoing recordkeeping and reporting procedures in accordance with the general requirements of 40 CFR 63.10(c) (as applicable in Table 10 to 40 CFR 63 Subpart DDDDD), (e)(1), and (e)(2)(i).
- 6.2.11 If the Permittee chooses to comply using definition (2) of “startup” in 40 CFR 63.7575, the Permittee shall develop and implement a written startup and shutdown plan (SSP) according to the requirements in Condition 3.3.6c.ii. The SSP must be maintained onsite and available upon request for public inspection.
[391-3-1-.02(6)(b)1(i); 40 CFR 63.7505(e); and 40 CFR 70.6(a)(3)(i)]
- 6.2.12 Within 60 days following the completion of all initial performance tests required by Conditions 4.2.1b. and 4.2.5, the Permittee shall submit to the Division a Notification of Compliance Status that contains the following information:
[391-3-1-.02(6)(b)1(i); 40 CFR 63.7495(d); 40 CFR 63.7530(f); 40 CFR 63.7545(e); and 40 CFR 70.6(a)(3)(i)]
- a. A description of the affected boilers including identification of which subcategories the unit is in, the design heat input capacity of the unit, a description of the add-on controls used on the unit to comply with 40 CFR 63 Subpart DDDDD, description of the fuel(s) burned, including whether the fuel(s) were a secondary material determined by the Permittee or the EPA through a petition process to be a non-waste under 40 CFR 241.3, whether the fuel(s) were a secondary material processed from discarded non-hazardous secondary materials within the meaning of 40 CFR 241.3, and justification for the selection of fuel(s) burned during the compliance demonstration.
 - b. Summary of the results of all performance tests and calculations conducted to demonstrate initial compliance including all established operating limits, and including:
 - i. Identification of whether the Permittee is complying with the PM emission limit or the alternative TSM emission limit.
 - ii. Identification of whether the Permittee is complying the arithmetic mean of all valid hours of data from the previous 30 operating days or of the previous 720 hours. This identification shall be specified separately for each operating parameter.
 - c. A summary of the maximum CO emission levels recorded during the performance test to show that the Permittee has met any applicable emission standard in Table 1 to 40 CFR 63 Subpart DDDDD, if the Permittee is not using a CO CEMS to demonstrate compliance.
 - d. A signed certification that the Permittee has met all applicable emission limits and work practice standards.

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- e. If the Permittee had a deviation from any emission limit, work practice standard, or operating limit, the Permittee shall also submit a description of the deviation, the duration of the deviation, and the corrective action taken in the Notification of Compliance Status report.
 - f. In addition, the notification of compliance status must include the following certification(s) of compliance, as applicable, and signed by a responsible official:
 - i. “This facility completed the required initial tune-up for all of the boilers and process heaters covered by 40 CFR part 63 subpart DDDDD at this site.”
 - ii. Except for units that burn only natural gas, refinery gas, or other gas 1 fuel, or units that qualify for a statutory exemption as provided in section 129(g)(1) of the Clean Air Act, include the following: “No secondary materials that are solid waste were combusted in any affected unit.”
- 6.2.13 The Permittee shall submit semiannual compliance reports that contain the following information for the thermal oil heater system (ID No. TOHS) for each semiannual period ending June 30 and December 31 of each year. The first semiannual compliance report must cover the period beginning on the initial startup date of TOHS and ending on June 30 or December 31, whichever date is the first date that occurs at least 180 days after the initial startup date of TOHS. All reports shall be postmarked by July 31 and January 31, respectively, following each reporting period.
[391-3-1-.02(6)(b)1(i); 40 CFR 63.7550(a); 40 CFR 63.7550(b)(1) through (b)(5); 40 CFR 63.7550(c)(1) through (c)(5); Items 1.a. through 1.d. of Table 9 to 40 CFR 63 Subpart DDDDD; and 40 CFR 70.6(a)(3)(i)]
- a. For the 5-year tune up requirements specified in Condition 5.2.7, the Permittee shall submit a compliance report with the information in Subparagraphs d.i. through d.iii., d.xii. and d.xiii. of this Condition.
 - b. For the performance tests required by Conditions 4.2.1b., 4.2.2, 4.2.5, 4.2.6, and 4.2.8, the Permittee shall submit a compliance report with the information in Subparagraphs d.i. through d.iii., d.v. through d.ix., d.xi., d.xiii., and d.xiv. of this Condition and Condition 6.2.14.
 - c. For the COMS required by Condition 5.2.8 and the operating load CMS required by Condition 5.2.9, the compliance report must contain the information required in Subparagraphs d.i. through d.v., d.ix. through d.xi., d.xiii., and d.xiv. of this Condition and Condition 6.2.15.
 - d. The following information must be included for the purposes of Paragraphs a. through c. of this Condition, as applicable, in the semiannual compliance reports:
 - i. Company and Facility name and address.
 - ii. Process unit information, emissions limitations, and operating parameter limitations.

- iii. Date of report and beginning and ending dates of the reporting period.
- iv. For the COMS required by Condition 5.2.6 and the operating load CMS required by Condition 5.2.7, the Permittee shall include the monitoring equipment manufacturer(s) and model numbers and the date of the last CMS certification or audit.
- v. The total fuel use by each individual boiler subject to an emission limit within the reporting period, including, but not limited to, a description of the fuel, whether the fuel has received a non-waste determination by the EPA or the Permittee's basis for concluding that the fuel is not a waste, and the total fuel usage amount with units of measure.
- vi. For the 3-year performance tests specified in Condition 4.2.2b. and 4.2.6b., the date of the last 2 performance tests and a statement as to whether there have been any operational changes since the last performance test that could increase emissions.
- vii. A statement indicating that the Permittee burned no new types of fuel in an individual boiler subject to an emission limit. Or, if the Permittee did burn a new type of fuel and are subject to a HCl emission limit, the Permittee shall submit the calculation of chlorine input, using Equation 7 of 40 CFR 63.7530, that demonstrates that the boiler is still within its maximum chlorine input level established during the previous performance testing. If the Permittee burned a new type of fuel and are subject to a mercury emission limit, the Permittee shall submit the calculation of mercury input, using Equation 8 of 40 CFR 63.7530, that demonstrates that the boiler is still within its maximum mercury input level established during the previous performance testing. If the Permittee burned a new type of fuel and are subject to a TSM emission limit, the Permittee shall submit the calculation of TSM input, using Equation 9 of 40 CFR 63.7530, that demonstrates that the boiler is still within its maximum TSM input level established during the previous performance testing.
- viii. If the Permittee wishes to burn a new type of fuel in an individual boiler subject to an emission limit and the Permittee cannot demonstrate compliance with the maximum chlorine/mercury/TSM input operating limits using Equations 7, 8, or 9 of 40 CFR 63.7530, the Permittee shall include in the compliance report a statement indicating the intent to conduct a new performance test within 60 days of starting to burn the new fuel.
- ix. If there are no deviations from any emission limits or operating limits in Conditions 3.2.3b., 3.3.5, and 3.3.8, a statement that there were no deviations from the emission limits or operating limits during the reporting period.

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- x. If there were no deviations from the monitoring requirements including no periods during which the COMS required by Condition 5.2.8 and the operating load CMS required by Condition 5.2.9 were out of control as specified in 40 CFR 63.8(c)(7), a statement that there were no deviations and no periods during which the CMS were out of control during the reporting period.
 - xi. If a malfunction occurred during the reporting period, the report must include the number, duration, and a brief description for each type of malfunction which occurred during the reporting period and which caused or may have caused any applicable emission limitation to be exceeded. The report must also include a description of actions taken during a malfunction of a boiler or associated air pollution control device or CMS to minimize emissions in accordance with Condition 3.3.10, including actions taken to correct the malfunction.
 - xii. Include the date of the most recent tune-up for TOHS subject to only the requirement to conduct an 5-year tune-up according to Condition 5.2.7 respectively. Include the date of the most recent burner inspection if it was not done on a 5-year period and was delayed until the next scheduled or unscheduled unit shutdown.
 - xiii. Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report.
 - xiv. For each instance of startup or shutdown include the information required to be monitored, collected, or recorded according to the requirements of Condition 6.2.21.
- e. If there is a deviation from any emission limitation (emission limit and operating limit) where the Permittee is not using a CMS to comply with that emission limit or operating limit, or a deviation from a work practice standard for periods of startup and shutdown, during the reporting period, the report must contain the information in Condition 6.2.14.
 - f. If there were periods during which the CMSs, including the COMS required by Condition 5.2.8 and the operating load CMS required by Condition 5.2.9, were **out-of-control** as specified in 40 CFR 63.8(c)(7), or otherwise not operating, the report must contain the information in Condition 6.2.15.
- 6.2.14 For each deviation from an emission limit or operating limit in Conditions 3.2.3b., 3.3.5, and 3.3.8 that occurs at the thermal oil heater system (ID No. TOHS) where the Permittee is not using a CMS to comply with that emission limit or operating limit, or from the work practice standards specified in Conditions 3.3.6 and 3.3.7 for periods of startup and shutdown, the compliance report must additionally contain the following.
[391-3-1-.02(6)(b)1(i); 40 CFR 63.7550(d); and 40 CFR 70.6(a)(3)(i)]
- a. A description of the deviation and which emission limit, operating limit, or work practice standard from which the boiler deviated.

- b. Information on the number, duration, and cause of deviations (including unknown cause), as applicable, and the corrective action taken.
 - c. If the deviation occurred during an annual performance test, provide the date the annual performance test was completed.

- 6.2.15 For each deviation from an emission limit, operating limit, and monitoring requirement in Conditions 3.2.3b., 3.3.5, 3.3.8, and 5.2.8 through 5.2.10 occurring at the thermal oil heater system (ID No. TOHS) where the Permittee are using a CMS to comply with that emission limit or operating limit, the compliance report must additionally contain the following information. This includes any deviations from the site-specific monitoring plan as required in Condition 6.2.10.
[391-3-1-.02(6)(b)1(i); 40 CFR 63.7550(e); and 40 CFR 70.6(a)(3)(i)]
 - a. The date and time that each deviation started and stopped and description of the nature of the deviation (i.e., what the boiler deviated from).
 - b. The date and time that each CMS was inoperative, except for zero (low-level) and high-level checks.
 - c. The date, time, and duration that each CMS was out of control, including the information in 40 CFR 63.8(c)(8).
 - d. The date and time that each deviation started and stopped.
 - e. A summary of the total duration of the deviation during the reporting period and the total duration as a percent of the total boiler operating time during that reporting period.
 - f. A characterization of the total duration of the deviations during the reporting period into those that are due to control equipment problems, process problems, other known causes, and other unknown causes.
 - g. A summary of the total duration of CMS's downtime during the reporting period and the total duration of CMS downtime as a percent of the total boiler operating time during that reporting period.
 - h. A brief description of the boiler for which there was a deviation.
 - i. A description of any changes in CMSs, processes, or controls since the last reporting period for the boiler for which there was a deviation.

- 6.2.16 Within 60 days following the completion of each performance test required by Conditions 4.2.1b., 4.2.2, 4.2.5, 4.2.6, and 4.2.8, the Permittee shall submit the results of the performance test to the EPA via the **Compliance and Emissions Data Reporting Interface (CEDRI)**. (CEDRI can be accessed through the EPA's Central Data Exchange (CDX) (<https://cdx.epa.gov/>.) Performance test data must be submitted in a file format generated through use of the EPA's ERT or an electronic file format consistent with the extensible markup language (XML) schema listed on the EPA's ERT Web site. If the Permittee claims

that some of the performance test information being submitted is confidential business information (CBI), the Permittee shall submit a complete file generated through the use of the EPA's ERT or an alternate electronic file consistent with the XML schema listed on the EPA's ERT Web site, including information claimed to be CBI, on a compact disc, flash drive, or other commonly used electronic storage media to the EPA. The electronic media must be clearly marked as CBI and mailed to U.S. EPA/OAPQS/CORE CBI Office, Attention: Group Leader, Measurement Policy Group, MD C404-02, 4930 Old Page Rd., Durham, NC 27703. The same ERT or alternate file with the CBI omitted must be submitted to the EPA via the EPA's CDX as described earlier in this Condition.

[391-3-1-.02(6)(b)1(i); 40 CFR 63.7550(h)(1)(i); and 40 CFR 70.6(a)(3)(i)]

- 6.2.17 The Permittee shall submit all reports required by Condition 6.2.13 electronically to the EPA via the CEDRI. (CEDRI can be accessed through the EPA's CDX.) The Permittee shall use the appropriate electronic report in CEDRI for 40 CFR 63 Subpart DDDDD. Instead of using the electronic report in CEDRI for 40 CFR 63 Subpart DDDDD, the Permittee may submit an alternate electronic file consistent with the XML schema listed on the CEDRI Web site (<http://www.epa.gov/ttn/chief/cedri/index.html>), once the XML schema is available. If the reporting form specific to 40 CFR 63 Subpart DDDDD is not available in CEDRI at the time that the report is due, the Permittee shall submit the report to the Administrator at the appropriate address listed in 40 CFR 63.13. The Permittee shall begin submitting reports via CEDRI no later than 90 days after the form becomes available in CEDRI.

[391-3-1-.02(6)(b)1(i); 40 CFR 63.7550(h)(3); and 40 CFR 70.6(a)(3)(i)]

- 6.2.18 The Permittee shall keep the following records:

[391-3-1-.02(6)(b)1(i); 40 CFR 63.7555(a); and 40 CFR 70.6(a)(3)(i)]

- a. A copy of each notification and report that was submitted to comply with 40 CFR 63 Subpart DDDDD, including all documentation supporting any Initial Notification or Notification of Compliance Status or semiannual compliance reports that were submitted.
- b. Records of performance tests, fuel analyses, or other compliance demonstrations and performance evaluations.

- 6.2.19 For the COMS required by Condition 5.2.8 and the operating load CMS required by Condition 5.2.9, the Permittee shall keep the following records:

[391-3-1-.02(6)(b)1(i); 40 CFR 63.7555(b); and 40 CFR 70.6(a)(3)(i)]

- a. Records described in 40 CFR 63.10(b)(2)(vii) through (xi).
- b. Monitoring data for COMS during a performance evaluation as required in 40 CFR 63.6(h)(7)(i) and (ii).
- c. Previous (i.e., superseded) versions of the performance evaluation plan as required in 40 CFR 63.8(d)(3).
- d. Records of the date and time that each deviation started and stopped.

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- 6.2.20 The Permittee shall keep the records required in Conditions 5.2.8e. and i. and 5.2.9a., d., and f., including records of all monitoring data and calculated averages for applicable operating limits, such as opacity and operating load, to show continuous compliance with each associate emission limit and operating limit.
[391-3-1-.02(6)(b)1(i); 40 CFR 63.7555(c); and 40 CFR 70.6(a)(3)(i)]
- 6.2.21 The Permittee shall also keep the following records for the thermal oil heater system (ID No. TOHS):
[391-3-1-.02(6)(b)1(i); 40 CFR 63.7555(d); and 40 CFR 70.6(a)(3)(i)]
- a. Records of monthly fuel use by TOHS, including the type(s) of fuel and amount(s) used.
[40 CFR 63.7540(a)(2)]
 - b. If the Permittee combusts non-hazardous secondary materials that have been determined not to be solid waste pursuant to 40 CFR 241.3(b)(1) and (2), the Permittee shall keep a record that documents how the secondary material meets each of the legitimacy criteria under 40 CFR 241.3(d)(1). If the Permittee combusts a fuel that has been processed from a discarded non-hazardous secondary material pursuant to 40 CFR 241.3(b)(4), the Permittee shall keep records as to how the operations that produced the fuel satisfy the definition of processing in 40 CFR 241.2. If the fuel received a non-waste determination pursuant to the petition process submitted under 40 CFR 241.3(c), the Permittee shall keep a record that documents how the fuel satisfies the requirements of the petition process. For operating units that combust non-hazardous secondary materials as fuel per 40 CFR 241.4, the Permittee shall keep records documenting that the material is listed as a non-waste under 40 CFR 241.4(a). Units exempt from the incinerator standards under section 129(g)(1) of the Clean Air Act because they are qualifying facilities burning a homogeneous waste stream do not need to maintain the records described in this Paragraph.
 - c. A copy of all calculations and supporting documentation of maximum chlorine fuel input, using Equation 7 of 40 CFR 63.7530, that were done to demonstrate continuous compliance with the HCl emission limit, for boilers that demonstrate compliance through performance testing. Supporting documentation should include results of any fuel analyses and basis for the estimates of maximum chlorine fuel input or HCl emission rates. The Permittee may use the results from one fuel analysis for multiple boilers provided they are all burning the same fuel type. However, the Permittee shall calculate chlorine fuel input, or HCl emission rate, for TOHS.
 - d. A copy of all calculations and supporting documentation of maximum mercury fuel input, using Equation 8 of 40 CFR 63.7530, that were done to demonstrate continuous compliance with the mercury emission limit for boilers that demonstrate compliance through performance testing. Supporting documentation should include results of any fuel analyses and basis for the estimates of maximum mercury fuel input or mercury emission rates. The Permittee may use the results from one fuel analysis for multiple boilers provided they are all burning the same fuel type. However, the Permittee shall calculate mercury fuel input, or mercury emission rates, for TOHS.

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- e. If, consistent with Conditions 4.2.2b. and 4.2.6b., the Permittee chooses to stack test less frequently than annually, the Permittee shall keep a record that documents that the emissions in the previous stack test(s) were less than 75 percent of the applicable emission limit, and document that there was no change in boiler operations including fuel composition and operation of air pollution control equipment that would cause emissions of the relevant pollutant to increase within the past year.
- f. Records of the occurrence and duration of each malfunction of the boiler or of the associated air pollution control and monitoring equipment.
- g. Records of actions taken during periods of malfunction to minimize emissions in accordance with the general duty to minimize emissions in Condition 3.3.10, including corrective actions to restore the malfunctioning boiler or process heater, air pollution control, or monitoring equipment to its normal or usual manner of operation.
- h. Records of the calendar date, time, occurrence and duration of each startup and shutdown.
- i. Records of the type(s) and amount(s) of fuels used during each startup and shutdown.
- j. For each startup period, for boilers selecting definition (2) of “startup” in 40 CFR 63.7575, the Permittee shall maintain records of the time that clean fuel combustion begins; the time when the Permittee starts feeding fuels that are not clean fuels; the time when useful thermal energy is first supplied; and the time when the PM controls are engaged.
- k. If the Permittee chooses to rely on definition (2) of “startup” in 40 CFR 63.7575, for each startup period, the Permittee shall maintain records of the hourly steam temperature, hourly steam pressure, hourly steam flow, hourly flue gas temperature, and all hourly average CMS data (e.g., COMS and operating load CMS) collected during each startup period to confirm that the control devices are engaged. In addition, for the thermal oil heater system (ID No. TOHS) with an electrostatic precipitator (ID No. ESP), the Permittee shall record the number of fields in service, as well as each field's secondary voltage and secondary current during each hour of startup.
- l. If the Permittee chooses to use definition (2) of “startup” in 40 CFR 63.7575 and finds that the Permittee is unable to safely engage and operate the PM control(s) within 1 hour of first firing of non-clean fuels, the Permittee may choose to rely on definition (1) of “startup” in 40 CFR 63.7575 or the Permittee may submit to the Division a request for a variance with the PM controls requirement, as described below.
 - i. The request shall provide evidence of a documented manufacturer-identified safety issue.
 - ii. The request shall provide information to document that the PM control device is adequately designed and sized to meet the applicable PM emission limit.
 - iii. In addition, the request shall contain documentation that:

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- A. The boiler is using clean fuels to the maximum extent possible to bring the unit and PM control device up to the temperature necessary to alleviate or prevent the identified safety issues prior to the combustion of primary fuel;
 - B. The boiler has explicitly followed the manufacturer's procedures to alleviate or prevent the identified safety issue; and
 - C. Identifies with specificity the details of the manufacturer's statement of concern.
- iv. The Permittee shall comply with all other work practice requirements, including but not limited to data collection, recordkeeping, and reporting requirements.

Attachments

- A. List of Standard Abbreviations and List of Permit Specific Abbreviations
- B. Insignificant Activities Checklist, Insignificant Activities Based on Emission Levels and Generic Emission Groups
- C. List of References

List Of Standard Abbreviations

[illegible]

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West Fraser – Dudley Lumber Mill

Permit No.: 2421-175-0035-V-05-1

ATTACHMENT B

NOTE: Attachment B contains information regarding insignificant emission units/activities and groups of generic emission units/activities in existence at the facility at the time of Permit issuance. Future modifications or additions of insignificant emission units/activities and equipment that are part of generic emissions groups may not necessarily cause this attachment to be updated.

INSIGNIFICANT ACTIVITIES CHECKLIST

Category	Description of Insignificant Activity/Unit	Quantity
Mobile Sources	1. Cleaning and sweeping of streets and paved surfaces	
Combustion Equipment	1. Fire fighting and similar safety equipment used to train fire fighters or other emergency personnel.	1
	2. Small incinerators that are not subject to any standard, limitation or other requirement under Section 111 or 112 (excluding 112(r)) of the Federal Act and are not considered a “designated facility” as specified in 40 CFR 60.32e of the Federal emissions guidelines for Hospital/Medical/Infectious Waste Incinerators, that are operating as follows:	
	i) Less than 8 million BTU/hr heat input, firing types 0, 1, 2, and/or 3 waste.	
	ii) Less than 8 million BTU/hr heat input with no more than 10% pathological (type 4) waste by weight combined with types 0, 1, 2, and/or 3 waste.	
	iii) Less than 4 million BTU/hr heat input firing type 4 waste. (Refer to 391-3-1-.03(10)(g)2.(ii) for descriptions of waste types)	
	3. Open burning in compliance with Georgia Rule 391-3-1-.02 (5).	
	4. Stationary engines burning:	
	i) Natural gas, LPG, gasoline, dual fuel, or diesel fuel which are used exclusively as emergency generators shall not exceed 500 hours per year or 200 hours per year if subject to Georgia Rule 391-3-1-.02(2)(mmm).7	
	ii) Natural gas, LPG, and/or diesel fueled generators used for emergency, peaking, and/or standby power generation, where the combined peaking and standby power generation do not exceed 200 hours per year.	
	iii) Natural gas, LPG, and/or diesel fuel used for other purposes, provided that the output of each engine does not exceed 400 horsepower and that no individual engine operates for more than 2,000 hours per year.	
	iv) Gasoline used for other purposes, provided that the output of each engine does not exceed 100 horsepower and that no individual engine operates for more than 500 hours per year.	
Trade Operations	1. Brazing, soldering, and welding equipment, and cutting torches related to manufacturing and construction activities whose emissions of hazardous air pollutants (HAPs) fall below 1,000 pounds per year.	
Maintenance, Cleaning, and Housekeeping	1. Blast-cleaning equipment using a suspension of abrasive in water and any exhaust system (or collector) serving them exclusively.	
	2. Portable blast-cleaning equipment.	
	3. Non-Perchloroethylene Dry-cleaning equipment with a capacity of 100 pounds per hour or less of clothes.	
	4. Cold cleaners having an air/vapor interface of not more than 10 square feet and that do not use a halogenated solvent.	
	5. Non-routine clean out of tanks and equipment for the purposes of worker entry or in preparation for maintenance or decommissioning.	
	6. Devices used exclusively for cleaning metal parts or surfaces by burning off residual amounts of paint, varnish, or other foreign material, provided that such devices are equipped with afterburners.	
	7. Cleaning operations: Alkaline phosphate cleaners and associated cleaners and burners.	

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West Fraser – Dudley Lumber Mill

Permit No.: 2421-175-0035-V-05-1

INSIGNIFICANT ACTIVITIES CHECKLIST

Category	Description of Insignificant Activity/Unit	Quantity
Laboratories and Testing	1. Laboratory fume hoods and vents associated with bench-scale laboratory equipment used for physical or chemical analysis.	
	2. Research and development facilities, quality control testing facilities and/or small pilot projects, where combined daily emissions from all operations are not individually major or are support facilities not making significant contributions to the product of a collocated major manufacturing facility.	
Pollution Control	1. Sanitary waste water collection and treatment systems, except incineration equipment or equipment subject to any standard, limitation or other requirement under Section 111 or 112 (excluding 112(r)) of the Federal Act.	
	2. On site soil or groundwater decontamination units that are not subject to any standard, limitation or other requirement under Section 111 or 112 (excluding 112(r)) of the Federal Act.	
	3. Bioremediation operations units that are not subject to any standard, limitation or other requirement under Section 111 or 112 (excluding 112(r)) of the Federal Act.	
	4. Landfills that are not subject to any standard, limitation or other requirement under Section 111 or 112 (excluding 112(r)) of the Federal Act.	
Industrial Operations	1. Concrete block and brick plants, concrete products plants, and ready mix concrete plants producing less than 125,000 tons per year.	
	2. Any of the following processes or process equipment which are electrically heated or which fire natural gas, LPG or distillate fuel oil at a maximum total heat input rate of not more than 5 million BTU's per hour:	
	i) Furnaces for heat treating glass or metals, the use of which do not involve molten materials or oil-coated parts.	
	ii) Porcelain enameling furnaces or porcelain enameling drying ovens.	
	iii) Kilns for firing ceramic ware.	
	iv) Crucible furnaces, pot furnaces, or induction melting and holding furnaces with a capacity of 1,000 pounds or less each, in which sweating or distilling is not conducted and in which fluxing is not conducted utilizing free chlorine, chloride or fluoride derivatives, or ammonium compounds.	
	v) Bakery ovens and confection cookers.	
	vi) Feed mill ovens.	
	vii) Surface coating drying ovens	
	3. Carving, cutting, routing, turning, drilling, machining, sawing, surface grinding, sanding, planing, buffing, shot blasting, shot peening, or polishing; ceramics, glass, leather, metals, plastics, rubber, concrete, paper stock or wood, also including roll grinding and ground wood pulping stone sharpening, provided that:	2
	i) Activity is performed indoors; &	
	ii) No significant fugitive particulate emissions enter the environment; &	
	iii) No visible emissions enter the outdoor atmosphere.	
	4. Photographic process equipment by which an image is reproduced upon material sensitized to radiant energy (e.g., blueprint activity, photographic developing and microfiche).	
	5. Grain, food, or mineral extrusion processes	
	6. Equipment used exclusively for sintering of glass or metals, but not including equipment used for sintering metal-bearing ores, metal scale, clay, fly ash, or metal compounds.	
	7. Equipment for the mining and screening of uncrushed native sand and gravel.	
	8. Ozonization process or process equipment.	
	9. Electrostatic powder coating booths with an appropriately designed and operated particulate control system.	
	10. Activities involving the application of hot melt adhesives where VOC emissions are less than 5 tons per year and HAP emissions are less than 1,000 pounds per year.	
	11. Equipment used exclusively for the mixing and blending water-based adhesives and coatings at ambient temperatures.	
	12. Equipment used for compression, molding and injection of plastics where VOC emissions are less than 5 tons per year and HAP emissions are less than 1,000 pounds per year.	
	13. Ultraviolet curing processes where VOC emissions are less than 5 tons per year and HAP emissions are less than 1,000 pounds per year.	

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INSIGNIFICANT ACTIVITIES CHECKLIST

Category	Description of Insignificant Activity/Unit	Quantity
Storage Tanks and Equipment	1. All petroleum liquid storage tanks storing a liquid with a true vapor pressure of equal to or less than 0.50 psia as stored.	
	2. All petroleum liquid storage tanks with a capacity of less than 40,000 gallons storing a liquid with a true vapor pressure of equal to or less than 2.0 psia as stored that are not subject to any standard, limitation or other requirement under Section 111 or 112 (excluding 112(r)) of the Federal Act.	
	3. All petroleum liquid storage tanks with a capacity of less than 10,000 gallons storing a petroleum liquid.	3
	4. All pressurized vessels designed to operate in excess of 30 psig storing petroleum fuels that are not subject to any standard, limitation or other requirement under Section 111 or 112 (excluding 112(r)) of the Federal Act.	
	5. Gasoline storage and handling equipment at loading facilities handling less than 20,000 gallons per day or at vehicle dispensing facilities that are not subject to any standard, limitation or other requirement under Section 111 or 112 (excluding 112(r)) of the Federal Act.	3
	6. Portable drums, barrels, and totes provided that the volume of each container does not exceed 550 gallons.	1
	7. All chemical storage tanks used to store a chemical with a true vapor pressure of less than or equal to 10 millimeters of mercury (0.19 psia).	

INSIGNIFICANT ACTIVITIES BASED ON EMISSION LEVELS

Description of Emission Units / Activities	Quantity

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ATTACHMENT B (continued)

GENERIC EMISSION GROUPS

Emission units/activities appearing in the following table are subject only to one or more of Georgia Rules 391-3-1-.02 (2) (b), (e) &/or (n). Potential emissions of particulate matter, from these sources based on TSP, are less than 25 tons per year per process line or unit in each group. Any emissions unit subject to a NESHAP, NSPS, or any specific Air Quality Permit Condition(s) are not included in this table.

Description of Emissions Units / Activities	Number of Units (if appropriate)	Applicable Rules		
		Opacity Rule (b)	PM from Mfg Process Rule (e)	Fugitive Dust Rule (n)
None				

The following table includes groups of fuel burning equipment subject only to Georgia Rules 391-3-1-.02 (2) (b) & (d). Any emissions unit subject to a NESHAP, NSPS, or any specific Air Quality Permit Condition(s) are not included in this table.

Description of Fuel Burning Equipment	Number of Units
Fuel burning equipment with a rated heat input capacity of less than 10 million BTU/hr burning only natural gas and/or LPG.	0
Fuel burning equipment with a rated heat input capacity of less than 5 million BTU/hr, burning only distillate fuel oil, natural gas and/or LPG.	0
Any fuel burning equipment with a rated heat input capacity of 1 million BTU/hr or less.	0

ATTACHMENT C**LIST OF REFERENCES**

1. The Georgia Rules for Air Quality Control Chapter 391-3-1. All Rules cited herein which begin with 391-3-1 are State Air Quality Rules.
2. Title 40 of the Code of Federal Regulations; specifically 40 CFR Parts 50, 51, 52, 60, 61, 63, 64, 68, 70, 72, 73, 75, 76 and 82. All rules cited with these parts are Federal Air Quality Rules.
3. *Georgia Department of Natural Resources, Environmental Protection Division, Air Protection Branch, Procedures for Testing and Monitoring Sources of Air Pollutants.*
4. *Georgia Department of Natural Resources, Environmental Protection Division, Air Protection Branch, Procedures for Calculating Air Permit Fees.*
5. Compilation of Air Pollutant Emission Factors, AP-42, Fifth Edition, Volume I: Stationary Point and Area Sources. This information may be obtained from EPA's TTN web site at www.epa.gov/ttn/chief/ap42/index.html.
6. The latest properly functioning version of EPA's **TANKS** emission estimation software. The software may be obtained from EPA's TTN web site at www.epa.gov/ttn/chief/software/tanks/index.html.
7. The Clean Air Act (42 U.S.C. 7401 et seq).
8. White Paper for Streamlined Development of Part 70 Permit Applications, July 10, 1995 (White Paper #1).
9. White Paper Number 2 for Improved Implementation of the Part 70 Operating Permits Program, March 5, 1996 (White Paper #2).